

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	CRIMINAL NO. 11-CR-30108-DRH
vs.	)	
	)	
RICHARD J. KLEMIS,	)	
	)	
Defendant.	)	

**NOTICE OF EXPERT WITNESSES**

The United States of America, by and through Stephen R. Wigginton, United States Attorney for the Southern District of Illinois, and Robert L. Garrison, Assistant United States Attorney, hereby gives notice to the defense of its intent to call expert witnesses in its case-in-chief at trial. The witnesses names, opinions, the basis and the reasons therefor, and the witnesses' qualifications are set forth as follows:

1. Dr. Emillia Lloyd, M.D.

Dr. Emillia Lloyd will testify as both a fact witness, and an expert witness in the field of medicine.

As a fact witness, Dr. Lloyd will testify that on September 30, 2010, she responded to the scene of a reported injury near her home on Kelley Drive in O'Fallon, Illinois. She will testify that upon arrival, she observed Eric Schulze collapsed and unconscious in a pickup truck. She will further testify that she provided emergency medical assistance to Schulze, and that she asked someone to notify her husband, Dr. Aaron Lloyd, that his assistance was also needed. Dr. Emillia Lloyd's factual observations are summarized in police reports which have been delivered to the defense as part of discovery in this case.

As an expert witness in the field of medicine, Dr. Lloyd is expected to give her opinion that Eric Schulze's injuries created a substantial risk of death. Dr. Lloyd will base her opinion on her observations of Schulze, and on her years of training and experience as a medical doctor. Her qualifications and professional experience are set forth in Exhibit 3 hereto, and incorporated by reference.

2. Dr. Aaron Lloyd, M.D.

Dr. Aaron Lloyd will also testify as both a fact witness, and an expert witness in the field of medicine.

As a fact witness, Dr. Lloyd will testify that he was summoned by a neighbor on September 30, 2010 to assist his wife, Dr. Emilia Lloyd, in her attempt to revive Eric Schulze. He will testify that upon arrival, he observed Eric Schulze to be unconscious inside a pickup truck. He will further testify that he and another man who lived nearby were able to remove Schulze from the truck, and put him on a nearby lawn. Dr. Aaron Lloyd will testify that he then provided emergency medical assistance to Schulze. Dr. Aaron Lloyd's factual observations are summarized in police reports, and in a videotaped police interview of Dr. Aaron Lloyd, which have been delivered to the defense as part of discovery in this case.

As an expert witness in the field of medicine, Dr. Lloyd is expected to give his opinion that Eric Schulze's injuries created a substantial risk of death. Dr. Lloyd will base his opinion on his observations of Schulze, and on his years of training and experience as a medical doctor. His qualifications and professional experience are set forth in Exhibit 4 hereto, and incorporated by reference.

3. In the event it becomes necessary for the Government to call additional expert witnesses, an additional notice will be sent.

Respectfully submitted,

STEPHEN R.  
WIGGINTON United  
States Attorney

*s/ Robert L. Garrison*  
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**Certificate of Service**

I hereby certify that on September 12, 2014 I caused to be electronically filed NOTICE OF EXPERT WITNESSES with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

William D. Stiehl, Jr.

Respectfully submitted,

STEPHEN R. WIGGINTON  
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